

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

DIANA ALLIPRANDINI

Debtor

Chapter 7

No. 19-13470

**APPLICATION OF CHAPTER 7 TRUSTEE FOR AN ORDER AUTHORIZING THE
TRUSTEE TO EMPLOY LAW OFFICE OF ROBERT H. HOLBER, P.C. AS COUNSEL
PURSUANT
TO 11 U.S.C. §§ 327 AND 328 AND FED. R. BANKR. P. 2014**

Robert H. Holber, Chapter 7 Trustee (the “Trustee”) of the bankruptcy estate of Diana Alliprandini (the “Debtor”) in the above-captioned Chapter 7 case, hereby files this Application (the “Application”) for entry of an Order, pursuant to 11 U.S.C. Sections 327 and 328 and Fed. R. Bankr. P. 2014, authorizing the employment of Law Office of Robert H. Holber, P.C. (“RHH”) as counsel for the Trustee, effective as of the date of this Application. In support of the Application, the Trustee relies upon the Affidavit of Robert H. Holber (the “Holber Affidavit”) attached hereto as Exhibit A and incorporated by reference, and respectfully represents as follows:

1. On May 30, 2019, the Debtors filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the “Bankruptcy Code”).
2. Thereafter, the Office of the United States Trustee appointed Robert H. Holber as Interim Chapter 7 Trustee of the Debtor’s estate.
3. The Trustee has selected Law Office of Robert H. Holber, P.C. as his counsel and requested that it immediately commence work on his behalf. Through this Application, the Trustee seeks authority to employ RHH.
4. RHH, with an office in Pennsylvania, has extensive experience and expertise in bankruptcy and reorganization proceedings. The Trustee seeks the employment of RHH to

represent it and perform services for the Trustee in connection with carrying out its fiduciary duties and responsibilities under the Bankruptcy Code consistent with Chapter 7.

5. The Trustee anticipates RHH will perform the following services in connection with its retention: (i) assist the Trustee in objecting to exemptions, (ii) assist the Trustee in selling a mobile home or any other property, (iii) assist the Trustee in employing an accountant; (iv) give the Trustee legal advice with respect to his powers and duties as Trustee; (v) prepare necessary applications, answers, orders, reports and other legal papers; (vi) pursue any claims or matters as the Trustee shall desire; (vii) assist the Trustee with a possible claim against holder of personal property transferred prepetition, and (viii) provide any and all other legal services for the Trustee which may be necessary or desirable in connection with this case.

6. Robert H. Holber, Esquire, counsel at RHH, has broad-based experience and a respected reputation in bankruptcy and reorganization proceedings. Through RHH, the Trustee will have the benefit of such knowledge and experience.

7. Subject to the approval of this Court, RHH will charge the Trustee for its legal services on an hourly basis in accordance with its ordinary and customary rates, which are in effect on the date the services are rendered, subject to periodic adjustment. RHH has advised the Trustee that the current hourly rates, which will be charged are as follows:

| | |
|------------------|-------------------|
| Robert H. Holber | \$250.00 per hour |
|------------------|-------------------|

Hourly rates of paralegals' rates are \$50 per hour. In addition to the hourly rates previously referred to, RHH customarily charges clients for actual and necessary costs of support services the firm provides in connection with a representation, including, without limitation, court reporters, transcripts, computerized research, filing fees, photocopying charges, long distance telephone calls, facsimile transmissions, messengers, courier mail, temporary services, travel,

lodging, and catering for meetings. Some of these services are provided by RHH, in which case the charges are set by RHH, and others are provided by third party service providers, in which case the charges are set by the providers. RHH will charge the cost of these expenses in a manner and at rates consistent with charges generally made to the firm's other clients. All such charges for which RHH seeks payment are subject to Court approval and/or pursuant to any administrative procedures established by Order of the Court.

8. The Trustee has been advised that RHH will use every effort to staff the engagement in a cost-effective manner, including utilizing the firm's paralegal assistants to handle those aspects of the cases that can best be managed by a paralegal.

9. Based on the Holber Affidavit, the Trustee believes that RHH does not hold any interest adverse to the Debtor's estate and, while employed by the Trustee, will not represent any person having an adverse interest in connection with this case.

10. The Trustee believes that the employment of RHH is necessary and in the best interests of the Debtor's estate, enabling the Trustee to carry out his fiduciary duties owed to creditors under the Bankruptcy Code.

WHEREFORE, the Trustee respectfully requests the Court to enter the accompanying Order authorizing employment of RHH as counsel to the Trustee, pursuant to §§ 327 and 328 of the Bankruptcy Code, as well as Fed. R. Bankr. P. 2014, with compensation and reimbursement of expenses to be paid pursuant to §§ 330 and 331 of the Bankruptcy Code, and in accordance with applicable administrative procedures established by Order of this Court, if any, and for such other and further relief as the Court deems proper and just.

Dated:

8/7/19

By:



Robert H. Holber

Chapter 7 Trustee

LAW OFFICE OF ROBERT H. HOLBER,

P.C.

Dated:

8/7/19

By:



Robert H. Holber, Esquire
41 East Front Street
Media, PA 19063
Telephone 610-565-5463
Facsimile 610-565-5474

*Proposed Counsel for Robert H. Holber,
Chapter 7 Trustee*